

Case No. 2:23-cv-05664-HDV-MAR**DEFENDANT TRADER JOE'S UNITED'S MOTION FOR ATTORNEYS' FEES - TABLE #2****Time Entries****Julien Mirer Singla & Goldstein, PLLC**

Staff Member = Seth Goldstein (Active Only)

Group By Staff Member Group

Client - Case = TJU Trademark (Active Only)

Activity Code = All

Date	Status	Approval	BillableType	Activity	Staff Member	Start	Stop	Duration	Rate	Amount
Trader Joes United										
TJU Trademark										
06-27-2023	Billed		Billable	Reviewed Kathryn Cahan email sent to Jamie Edwards regarding Trademark infringement	Goldstein, Seth			0.250	1,057.00	264.25
06-28-2023	Billed		Billable	legal research on trademark infringement relating to Kathryn Cahan email	Goldstein, Seth			1.000	1,057.00	1,057.00
06-28-2023	Billed		Billable	Phone conference with National Officers to discuss response to Kathryn Cahan infringement letter.	Goldstein, Seth			0.500	1,057.00	528.50
07-05-2023	Billed		Billable	Met with national Officers to discuss TJ July 5 letter and TJU response.	Goldstein, Seth			0.250	1,057.00	264.25
07-05-2023	Billed		Billable	Reviewed and analyzed case law cited in TJ July 5, 2023 General Counsel letter	Goldstein, Seth			1.000	1,057.00	1,057.00
07-06-2023	Billed		Billable	Meeting with National Officers to discuss responding to TJ Trademark letter	Goldstein, Seth			1.000	1,057.00	1,057.00
07-11-2023	Billed		Billable	Legal research on Trademark Trader Joe's case	Goldstein, Seth			2.000	1,057.00	2,114.00
07-13-2023	Billed		Billable	Review and analyze Trader Joe's Complaint	Goldstein, Seth			1.500	1,057.00	1,585.50
07-14-2023	Billed		Billable	Legal Research relating to July 13 Trademark infringement Complaint	Goldstein, Seth			1.500	1,057.00	1,585.50
07-26-2023	Billed		Billable	Zoom conference with National officers to discuss status of the case.	Goldstein, Seth			1.000	1,057.00	1,057.00
07-28-2023	Billed		Billable	Phone call with client to discuss Trademark case strategy.	Goldstein, Seth			1.500	1,057.00	1,585.50
08-07-2023	Billed		Billable	Drafted and filed application with California District Court to appear Pro Hac Vice in Trademark case	Goldstein, Seth			1.500	1,057.00	1,585.50
08-15-2023	Billed		Billable	Prep meeting for meet and confer with Seth and Sonya	Goldstein, Seth			0.500	1,057.00	528.50
08-15-2023	Billed		Billable	Meet and confer with Defendant's Counsel David Eberhart, Andrew Levad, Scott Pink, Sonya Mehta and Retu Singla	Goldstein, Seth			0.250	1,057.00	264.25
08-15-2023	Billed		Billable	Prepare for meet and confer	Goldstein, Seth			0.500	1,057.00	528.50
08-15-2023	Billed		Billable	Discuss with client about the results of the meet and confer with defendant's attorneys in Trademark case	Goldstein, Seth			0.250	1,057.00	264.25
08-17-2023	Billed		Billable	Assist in Drafting Motion to Dismiss in Trademark case.	Goldstein, Seth			3.000	1,057.00	3,171.00
08-18-2023	Billed		Billable	Legal research and draft Motion to Dismiss for trademark case.	Goldstein, Seth			2.500	1,057.00	2,642.50
08-21-2023	Billed		Billable	Discuss Trademark case status with TJU	Goldstein, Seth			0.750	1,057.00	792.75
08-31-2023	Billed		Billable		Goldstein, Seth			0.250	1,057.00	264.25

Review and analyze letter from Andrew Levad requesting a 26(f) conference in Trademark case.						
09-05-2023	Billed	Billable	Goldstein, Seth	0.800	1,057.00	845.60
Review email Andrew Levad from O'Melveny and research case law cited in the letter						
09-28-2023	Billed	Billable	Goldstein, Seth	0.500	1,057.00	528.50
discussion with client and seth on medieval times decision						
09-28-2023	Billed	Billable	Goldstein, Seth	0.400	1,057.00	422.80
discussion with sonya on medieval times decision						
10-02-2023	Billed	Billable	Goldstein, Seth	0.250	1,057.00	264.25
Review email Eberhart letter for discovery						
10-04-2023	Billed	Billable	Goldstein, Seth	1.000	1,057.00	1,057.00
Drafted letter to David Eberhart, Esq. regarding discovery schedule						
10-04-2023	Billed	Billable	Goldstein, Seth	0.500	1,057.00	528.50
Drafted in file a ULP charge against Trader Joe's for retaliatory civil lawsuit against the union.						
10-19-2023	Billed	Billable	Goldstein, Seth	2.000	1,057.00	2,114.00
legal research to respond to Trader Joe's Trademark lawsuit						
10-23-2023	Billed	Billable	Goldstein, Seth	5.000	1,057.00	5,285.00
Draft TJU Response to TJ Opposition to Motion to Dismiss (Trademark case)						
11-01-2023	Billed	Billable	Goldstein, Seth	0.120	1,057.00	126.84
Phone call with Sonya Mehta regarding motion for Retu Singla to appear remotely for motion to dismiss on Trademark case.						
11-03-2023	Billed	Billable	Goldstein, Seth	1.000	1,057.00	1,057.00
Review case law and assist Retu Singla to prepare for Trademark court hearing on Motion to Dismiss						
11-09-2023	Billed	Billable	Goldstein, Seth	0.750	1,057.00	792.75
oral argument on MTD						
11-11-2023	Billed	Billable	Goldstein, Seth	0.250	1,057.00	264.25
Drafted and sent email to David Eberhart requesting a Section 7-3 meeting to discuss Rule 11 sanctions in Trademark case.						
11-13-2023	Billed	Billable	Goldstein, Seth	2.000	1,057.00	2,114.00
Legal Research on California Slap Law						
11-14-2023	Billed	Billable	Goldstein, Seth	0.100	1,057.00	105.70
Meeting with David Eberhart Counsel for Trader Joe's to discuss Rule 11 sanctions						
11-27-2023	Billed	Billable	Goldstein, Seth	1.500	1,057.00	1,585.50
research Rule 11 sanctions for Trader Joe's trademark case						
12-01-2023	Billed	Billable	Goldstein, Seth	1.500	1,057.00	1,585.50
Research Rule 11 Sanction Motion						
12-11-2023	Billed	Billable	Goldstein, Seth	1.500	1,057.00	1,585.50
Drafted Trader Joe's Rule 11 Sanctions Motion						
01-04-2024	Billed	Billable	Goldstein, Seth	0.500	1,057.00	528.50
Discuss with Sonya Mehta Defendant's Safe harbor letter and Rule 11 Motion						
01-04-2024	Billed	Billable	Goldstein, Seth	0.100	1,057.00	105.70
Email Safe harbor letter and draft Rule 11 Sanction Motion to David Eberhart						
01-22-2024	Billed	Billable	Goldstein, Seth	3.000	250.00	750.00
Drafted Declaration for attorney fees						

Case Total	43.770	43,843.89
Client Total	43.770	43,843.89
Grand Total	43.770	43,843.89

Staff Member = Retu Singla (Active Only)
 Group By Staff Member Group
 Client - Case = TJU Trademark (Active Only)
 Activity Code = All
 View = Original
 From 12-27-2022 To 01-26-2024

Time Entries

Julien Mirer Singla & G

Date	Status	Approval	Billable Activity	Staff Member	Start	Duration	Rate	Amount
Trader Joes United								
<u>TJU Trademark</u>								
06-27-2023	Billed		Billable	Singla, Retu		0.500	1,057.00	528.50
								Reviewed Kathryn Cahan email sent to Jamie Edwards regarding Trademark infringement and researched similar cases and found
06-28-2023	Billed		Billable	Singla, Retu		0.500	1,057.00	528.50
								Phone conference with National Officers to discuss response to Kathryn Cahan infringement letter.
06-28-2023	Billed		Billable	Singla, Retu		1.750	1,057.00	1,849.75
								Drafting and finalizing June 28, 2023 TJU letter to Kathryn Cahan regarding trademark infringement threat
07-05-2023	Billed		Billable	Singla, Retu		0.250	1,057.00	264.25
								Met with national Officers to discuss TJ July 5 letter and TJU response.
07-05-2023	Billed		Billable	Singla, Retu		0.500	1,057.00	528.50
								Reviewed TJ Letter from Kathryn Cahan, General Counsel including case law research
07-06-2023	Billed		Billable	Singla, Retu		1.000	1,057.00	1,057.00
								Meeting with National Officers to discuss responding to TJ Trademark letter
07-11-2023	Billed		Billable	Singla, Retu		3.750	1,057.00	3,963.75
								Trademark research
07-13-2023	Billed		Billable	Singla, Retu		3.250	1,057.00	3,435.25
								Review Complaint and begin legal research on claims
07-13-2023	Billed		Billable	Singla, Retu		0.250	1,057.00	264.25
								check docket
07-26-2023	Billed		Billable	Singla, Retu		1.000	1,057.00	1,057.00
								Zoom conference with National officers to discuss status of the case.
07-27-2023	Billed		Billable	Singla, Retu		0.500	1,057.00	528.50
								following up on service of complaint with client
07-28-2023	Billed		Billable	Singla, Retu		1.500	1,057.00	1,585.50
								Phone call with Seth and client to discuss Trademark case.

07-29-2023	Billed	Billable	Singla, Retu	0.500	1,057.00	528.50
	following up on service of complaint with client					
08-07-2023	Billed	Billable	Singla, Retu	1.300	1,057.00	1,374.10
	Pro Hac Vice application for California District Court					
08-15-2023	Billed	Billable	Singla, Retu	0.250	1,057.00	264.25
	Meet and confer with Defendant's Counsel David Eberhart, Andrew Levad, Scott Pink, Sonya Mehta and Retu Singla					
08-15-2023	Billed	Billable	Singla, Retu	0.250	1,057.00	264.25
	Inform client about meet and confer					
08-16-2023	Billed	Billable	Singla, Retu	5.000	1,057.00	5,285.00
	Drafting Motion to Dismiss					
08-17-2023	Billed	Billable	Singla, Retu	4.000	1,057.00	4,228.00
	Drafting Motion to Dismiss.					
08-18-2023	Billed	Billable	Singla, Retu	4.000	1,057.00	4,228.00
	Final Draft Motion to Dismiss					
08-21-2023	Billed	Billable	Singla, Retu	0.750	1,057.00	792.75
	Discuss MTD with Client					
08-29-2023	Billed	Billable	Singla, Retu	0.750	1,057.00	792.75
	Discussion about 26f conference with Sonya, checked docket, responded to OMM request for conference					
09-01-2023	Billed	Billable	Singla, Retu	0.500	1,057.00	528.50
	Discussion about 26f conference with Sonya, responded to OMM 2nd request for discovery					
09-11-2023	Billed	Billable	Singla, Retu	0.500	1,057.00	528.50
	email to Andrew Levad 3rd request for 26(f) discovery					
09-28-2023	Billed	Billable	Singla, Retu	0.500	1,057.00	528.50
	discussion with client and seth on medieval times decision					
09-28-2023	Billed	Billable	Singla, Retu	0.400	1,057.00	422.80
	discussion with sonya on medieval times decision					
10-02-2023	Billed	Billable	Singla, Retu	0.250	1,057.00	264.25
	Review OMM email for 4th discovery request					
10-04-2023	Billed	Billable	Singla, Retu	2.250	1,057.00	2,378.25
	Letter to OMM on rule 11, 26f, and medieval times decision					
10-24-2023	Billed	Billable	Singla, Retu	6.000	1,057.00	6,342.00
	Draft TJU Response to TJ Opposition to Motion to Dismiss					
11-01-2023	Billed	Billable	Singla, Retu	0.120	1,057.00	126.84
	Phone call with Sonya Mehta regarding motion for remote appearance for motion to dismiss					
11-03-2023	Billed	Billable	Singla, Retu	1.000	1,057.00	1,057.00
	Review case law and prepare for oral argument with seth					
11-09-2023	Billed	Billable	Singla, Retu	0.750	1,057.00	792.75

	oral argument on MTD					
11-09-2023	Billed	Billable	Singla, Retu	1.000	1,057.00	1,057.00
	oral argument on MTD prep					
11-11-2023	Billed	Billable	Singla, Retu	1.000	1,057.00	1,057.00
	Began Drafting Rule 11 motion to attach to safe harbor letter					
11-17-2023	Billed	Billable	Singla, Retu	2.000	1,057.00	2,114.00
	Drafting Rule 11 motion to attach to safe harbor letter					
12-19-2023	Billed	Billable	Singla, Retu	2.000	1,057.00	2,114.00
	Drafting Rule 11 motion to attach to safe harbor letter					
01-03-2024	Billed	Billable	Singla, Retu	3.500	1,057.00	3,699.50
	Final draft for Rule 11 Safe Harbor letter with Motion					
01-04-2024	Billed	Billable	Singla, Retu	0.500	1,057.00	528.50
	Discuss with Sonya and Seth Safe harbor letter and Rule 11 Motion					
01-23-2024	Billed	Billable	Singla, Retu	0.600	1,057.00	634.20
	Drafting second attorneys fees meet and confer request and scheduling communications with OMM and Seth and Sonya					
01-23-2024	Billed	Billable	Singla, Retu	5.000	1,057.00	5,285.00
	Draft Declaration for Attorney Fees (Trademark case)					
				Case Total	59.420	62,806.94
				Client Total	59.420	62,806.94
				Grand Total	59.420	62,806.94

01-26-2024 14:30:21

Sonya Mehta

Table 2

Attorneys' Hours for Case No. 2:23-cv-05664-HDV-MAR

Atty	Title	Date	Description	Duration	Rate
SM	Partner	2023-07-20	Call with Retu to learn about and sign on to case	0.5	\$777
SM	Partner	2023-08-14	TJU meeting with Retu to discuss next steps in	0.25	\$777
SM	Partner	2023-08-14	Review complaint and file	2	\$777
SM	Partner	2023-08-22	Complete and file notice of interested parties	0.25	\$777
SM	Partner	2023-08-22	Review chambers copies rules	0.25	\$777
SM	Partner	2023-08-17	Review rules for filing MTD, legal research, editing, cite checking	4	\$777
SM	Partner	2023-08-19	Edits to motion, additional research, RJN, proposed order, filing	6	\$777
SM	Partner	2023-08-19	Final proofing and cite checks to motion	2	\$777
SM	Partner	2023-10-25	Review Reply to OMTD* date correction from declaration filing 46-3, Exh. 3	0.5	\$777
SM	Partner	2023-11-09	Hearing and follow up	1	\$777
SM	Partner	2023-08-21	Fill out and submit reimburse form for PHV	0.25	\$777
SM	Partner	2023-08-22	PHV reimburse follow up	0.25	\$777
SM	Partner	2023-08-29	Antislapp legal research	1	\$777
SM	Partner	2023-08-29	Review and finalize PHV documents	1	\$777
SM	Partner	2023-09-12	AntiSLAPP legal research	1.5	\$777
SM	Partner	2023-10-27	Rule 11 research	0.75	\$777
SM	Partner	2024-01-04	Rule 11 research - timing	0.5	\$777
SM	Partner	2024-01-16	Discussion of order and follow up tasks - attys fees options, Rule 11	0.5	\$777
SM	Partner	2024-01-17	Attys fees and rule 11 research - timing of filing	1.5	\$777
SM	Partner	2024-01-18	1927 sanctions	0.25	\$777
SM	Partner	2023-10-05	Review Medieval Times and draft Notice of supplemental authority	2.75	\$777
SM	Partner	2023-11-01	Draft remote request and declaration ISO	1	\$777
SM	Partner	2024-01-22	Motion for attorneys fees (AF) research	2.5	\$777
SM	Partner	2024-01-22	Motion for AF - Laffey and rates research	0.5	\$777
SM	Partner	2024-01-23	Review Seth's dec	0.25	\$777
SM	Partner	2024-01-25	Draft Motion for AF	5	\$777
SM	Partner	2024-01-25	Review and integrate Singla dec into motion	0.25	\$777
SM	Partner	2024-01-25	Review and integrate Goldstein dec into motion	0.5	\$777
SM	Partner	2024-01-25	Relief sought hours worked review	0.25	\$777
SM	Partner	2024-01-25	Continue to integrate decs into motion	0.25	\$777
SM	Partner	2024-01-25	Draft argument	3	\$777
SM	Partner	2024-01-26	Edit motion, check cites	2	\$777
SM	Partner	2024-01-26	Call with Retu re dec and edits	0.25	\$777
SM	Partner	2024-01-26	Final dec review and integration, proposed order	1.25	\$777
			Estimate for reply brief and hearing	12	\$777
			Total hours	56	\$777
			Hours at \$777 rate	\$43,317.75	